

ERIC A. NYBERG, ESQ. (Bar No. 131105)  
CHRIS D. KUHNER, ESQ. (Bar No. 173291)  
**KORNFELD, NYBERG, BENDES & KUHNER, P.C.**  
1970 Broadway, Suite 225  
Oakland, California 94612  
Telephone: (510) 763-1000  
Facsimile: (510) 273-8669  
Email: e.nyberg@kornfieldlaw.com  
Email: c.kuhner@kornfieldlaw.com

Attorneys for Debtor i2a Technologies, Inc.

UNITED STATES BANKRUPTCY COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA

In re  
i2a Technologies, Inc.,

Debtor.

Case No. 14-44239 CN

Chapter 11

**STATEMENT OF NON-  
OPPOSITION TO U.S. TRUSTEE'S  
MOTION TO DISMISS CASE  
UNDER 11 U.S.C. § 1112(b)**

Date: April 30, 2015

Time: 10:30 a.m.

Ctrm: 215

U.S. Bankruptcy Court  
1300 Clay Street  
Oakland, California

i2a Technologies, Inc., the debtor and debtor-in-possession in the above-captioned Chapter 11 bankruptcy case (the "Debtor"), submits the following statement of non-opposition with regard to the U.S. Trustee's Motion to Dismiss Case Under 11 U.S.C. § 1112(b) which is currently set for hearing on April 30, 2015 at 10:30 a.m.

Given the current posture of the Debtor's Chapter 11 case, including the fact that secured creditors and the landlord of the business premises have obtained relief from the automatic stay, the Debtor does not oppose the dismissal of its Chapter 11 bankruptcy case.

Further, the Debtor surmises that the motion of the U.S. Trustee to dismiss the case will be moot by the time of the hearing on the U.S. Trustee's motion. The Court, at the continued status

1 conference in the Debtor's Chapter 11 case indicated it would, and then subsequently did, issue an  
2 Order to Show Cause Why the Chapter 11 Case Should Not Be Dismissed ("Order to Show  
3 Cause"). The Court's Order to Show Cause is currently set for hearing on April 23, 2015 at 10:30  
4 a.m. Thus, the Debtor anticipates that its Chapter 11 case will be dismissed by the time of the  
5 hearing on the U.S. Trustee's motion.

6 Dated: April 7, 2015

KORNFIELD, NYBERG, BENDES & KUHNER, P.C.

7  
8  
9 By: /s/ Eric A. Nyberg  
10 (Bar No. 131105)  
11 Attorneys for Debtor i2a Technologies, Inc.  
12  
13  
14  
15  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25  
26  
27  
28

**DECLARATION OF SERVICE**

I, the undersigned, declare:

I am employed in the City of Oakland, County of Alameda, California. I am over the age of 18 years and not a party to this action. My business address is 1970 Broadway, Suite 225, Oakland, California 94612.

I am readily familiar with the business practices of my employer, Kornfield, Nyberg, Bendes & Kuhner, P.C., for the collection and processing of correspondence for mailing with the United States Postal Service and that correspondence is deposited with the United States Postal Service that same day in the ordinary course of business.

On April 7, 2015, I served the following documents:

**STATEMENT OF NON-OPPOSITION TO U.S. TRUSTEE'S MOTION TO DISMISS CASE UNDER 11 U.S.C. § 1112(b)**

by placing copies of said documents in a sealed envelope and served in the manner described below addressed as follows:

Barbara A. Matthews  
Tracy Hope Davis  
U.S. Trustee  
1301 Clay Street, Suite 690N  
Oakland, CA 94612-5202

Stephen J. Kottmeier  
Brent Meyer/Jay Ross  
Hopkins & Carley  
P.O. Box 1469  
San Jose, CA 95113-2406

Marc Andrews  
John H. Wunsch  
Office of the General Counsel  
Wells Fargo & Company  
21680 Gateway Center Drive, Ste. 280  
Diamond Bar, CA 91765

Steven B. Mains  
Mains + Bloom, PC  
267 Locust Ave., Suite A  
San Rafael, CA 94901-2240

I placed such envelopes for collection and mailing at my employer's office following ordinary business practices, addressed to the addressee designated.

I declare under penalty of perjury that the foregoing is true and correct. Executed this 7<sup>th</sup> day of April, 2015 at Oakland, California.

/s/ Gail A. Michael